

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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HILLARY WRIGHT, :  
: No. 23 Civ. 7124 (AJC)  
: Plaintiff, :  
: ECF Case :  
: :  
-against- :  
: **NOTICE OF MOTION** :  
: :  
MAIL MEDIA INC., ASSOCIATED :  
NEWSPAPERS LTD., DAILY MAIL AND :  
GENERAL TRUST PLC, DMG MEDIA LTD., :  
RICH CACCAPPOLO, PAUL DACRE, and :  
GERARD GREAVES, :  
: :  
: Defendants. :  
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**PLEASE TAKE NOTICE** that Defendants, upon the accompanying Memorandum of Law and Declaration of Paul Dacre dated March 7, 2024, and all prior pleadings and proceedings hereto, by their undersigned attorneys, hereby respectfully move this Court, before the Honorable Andrew L. Carter Jr., United States District Judge, at the United States Courthouse, 40 Foley Square, Courtroom 1306, New York, NY 10007, for an order, pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(6), and 12(f), (1) dismissing the Complaint against Defendant Paul Dacre for lack of personal jurisdiction; (2) dismissing all claims against Defendants Mail Media Inc., Associated Newspapers Ltd., Daily Mail and General Trust PLC, Rich Caccappolo, Paul Dacre, and Gerard Greaves for failure to state a claim; (3) dismissing all claims against Defendant DMG Media Ltd. for failure to state a claim except those for copyright infringement and removal of copyright management information; (4) dismissing claims for statutory damages and attorney's fees under the Copyright Act; (5) striking Paragraphs 52 and

Paragraphs 54 through 59 from the Complaint; and (6) granting such other relief as this Court deems appropriate.

Dated: March 8, 2024

Respectfully submitted,

**BALLARD SPAHR LLP**

By: /s/ Thomas B. Sullivan

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of March 2024, I directed that a true and correct copy of the foregoing **NOTICE OF MOTION** be filed via the court's electronic filing system and emailed and sent via U.S. Mail this same date upon the following:

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*Pro Se Plaintiff*

/s/ Thomas B. Sullivan  
Thomas B. Sullivan